

**From:** Robertson, Dina  
**Sent:** Thursday, December 16, 2004 3:13 PM  
**To:** NIEHS ICCVAM  
**Subject:** rabbit eye irritation testing

I would like to see the United States become the world leader, rather than the weakest link, in the move away from animal testing. The ICCVAM should follow the example set by European countries that accept the results of the in vitro methods, alone or in combination, to classify severely irritating and corrosive chemicals, and should eliminate proposals for "confirmatory" testing on animals. ICCVAM's background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate. ICCVAM should not presume to "validate" a non-animal method against an animal test that has never been properly validated itself. ICCVAM should take the time to learn that these tests are being used safely and effectively by the industry today. ICCVAM should stop dragging its heels and setting up obstacles to the acceptance and use of non-animal test methods in the U.S. This is an important issue if we want to be a loving, humane country. There are other ways, let's use them...please!!!  
Thank you for your time,  
Dina Robertson